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7  
8 UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

9 LOIS ROBINSON, an individual

Court Case No.: 2:13-cv-01708-JCM-GWF

10 Plaintiffs,

vs.

District Court Case No. A-13-685017-C  
District Court Dept. No. XVII

11 AMERICAN MEDICAL SYSTEMS, INC., a  
12 Delaware corporation; AMERICAN  
13 MEDICAL SYSTEMS HOLDINGS, INC., a  
Delaware corporation; ENDO  
14 PHARMACEUTICALS, INC., a Pennsylvania  
corporation; ENDO PHARMACEUTICALS  
15 HOLDINGS, INC. a Delaware corporation;  
and ENDO HEALTH SOLUTIONS INC., a  
Delaware corporation; and DOES 1-10 and  
16 ROE ENTITIES 11-20, inclusive

**STIPULATION AND ORDER TO STAY  
PROCEEDINGS PENDING DECISION  
REGARDING TRANSFER TO MDL**

17 Defendants.

19  
20 The undersigned counsel of record for Defendants American Medical Systems, Inc.,  
21 American Medical Systems Holdings, Inc., Endo Pharmaceuticals, Inc., and Endo Health Solutions  
22 Inc. (formerly known as Endo Pharmaceuticals Holdings, Inc.) (collectively “Defendants”) and Lois  
23 Robinson (“Plaintiff”) hereby stipulate and agree to stay these proceedings pending a decision from  
24 the Judicial Panel on Multidistrict Litigation (“JPML”) based on the foregoing:

25 1. The above-entitled action was commenced in the Eighth Judicial District Court, in  
26 and for Clark County, Nevada, Case No. A-13-685017-C (“State Court Action”).

1           2. Plaintiff Lois Robinson commenced the State Court Action by filing a complaint  
2 ("Complaint") on July 11, 2013. Plaintiff filed an Amended Complaint ("Amended Complaint") on  
3 September 5, 2013.

4           3. Counsel for Defendants accepted service of the Amended Complaint as to all  
5 Defendants on September 6, 2013.

6           4. Notice of Removal to the United States District Court For the District of Nevada was  
7 filed by Defendants on September 18, 2013.

8           5. The Judicial Panel on Multidistrict Litigation ("JPML") has established four separate  
9 Multi-District Litigation proceedings ("MDL") for claims related to pelvic mesh products, including  
10 the devices at issue here. There are more than 17,000 cases like this one in *In re: American Medical  
11 Systems, Inc., Pelvic Repair System Products Liability*, MDL 2325 (the "AMS MDL") pending in  
12 the United States District Court for the Southern District of West Virginia for coordinated pretrial  
13 proceedings under 28 U.S.C. § 1407.

14           6. Defendants are seeking the transfer of this action to the AMS MDL and have  
15 provided the JPML notice of this action pursuant to the "tag-along" procedure contained in the  
16 MDL Rules.

17           7. Defendants and Plaintiff hereby agree to a stay of the instant proceedings pending a  
18 decision regarding transfer by the JPML.

19           Dated this 25th day of September, 2013

Dated this 25th day of September, 2013

20           GREENBERG TRAURIG, LLP

EGLET WALL CHRISTIANSEN

21           \_\_\_\_\_  
22           /s/ Kara B. Hendricks  
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27           Attorneys for Defendant

28           \_\_\_\_\_  
29           /s/ Erica D. Entsminger  
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34           Attorneys for Plaintiff

35           IT IS SO ORDERED this 4th day of October, 2013:

36             
37           GEORGE FOLEY, JR.  
38           United States Magistrate Judge